

**From:** [ANDERSON Jim M](#)  
**To:** [Mark Ader/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** [Kristine Koch/R10/USEPA/US@EPA](#); [Sean Sheldrake/R10/USEPA/US@EPA](#)  
**Subject:** RE: UP Fill Material  
**Date:** 09/23/2010 12:37 PM

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Mark,  
Technically & rigidly the Roosevelt HS soil doesn't meet DEQ's definition of clean fill for unrestricted use..., simply because of the 1 As hit >7ppm. However, given: 1) the understood history of the cut site (i.e., no industrial development or use other than as a HS), 2) the other As results <7ppm, 3) the other ND lab results, & 4) the understood intended use of the soil in a non-residential setting at the former Triangle Park site..., I don't have any objections to the proposed use of the Roosevelt HS soil at Triangle Park. I think the proposal generally meets the intent of our clean fill guidance. The only condition I'd suggest is that the fill not be placed within 100' of a surface water body or within 100' of a stormwater catch basin discharging to the river at the Triangle Park site.

Jim Anderson  
Manager, DEQ Portland Harbor Section  
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-----Original Message-----

From: Ader.Mark@epamail.epa.gov [mailto:Ader.Mark@epamail.epa.gov]  
Sent: Thursday, September 23, 2010 11:49 AM  
To: Humphrey.Chip@epamail.epa.gov; Blischke.Eric@epamail.epa.gov; ANDERSON Jim M  
Cc: Koch.Kristine@epamail.epa.gov; Sheldrake.Sean@epamail.epa.gov  
Subject: Fw: UP Fill Material

Chip and Jim, The University of Portland (UP) has access to some free top soil from a local high school to use at the Triangle Park site. I had them test it for RCRA metals, pesticides, and herbicides. The only contaminant detected above an action level or background was arsenic (see email below). AMEC did some research and the location of the high school was undeveloped prior to some time in the 1940's when the high school was constructed. So we did not think it was necessary to test for other contaminants. UP needs a quick decision from us on this as the high school needs to start moving this soil pile now. The detected levels of arsenic at from our recent sampling range from ~ 1.2 to 7 ppm. Please respond ASAP whether you think they can accept this and move it on site. This material will be used as top soil.

Mark Ader  
Remedial Project Manager  
Environmental Cleanup Office (ECL-115)  
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----- Forwarded by Mark Ader/R10/USEPA/US on 09/23/2010 11:28 AM -----

From: "Gray, Natasya" <Natasya.Gray@amec.com>  
To: "'ader.mark@epa.gov'" <ader.mark@epa.gov>  
Cc: "Dupuy, Gary" <Gary.Dupuy@amec.com>, "Blount, David" <DBlount@landye-bennett.com>, "Kuffner, James" <kuffner@up.edu>  
Date: 09/22/2010 11:24 AM  
Subject: UP Fill Material

Hi Mark,  
I left you a voicemail this morning but thought I'd follow-up via email in case that's a better way to catch you today.

As you and I discussed last week, we went out Roosevelt High School last week and collected 4 composite samples from the excavated soil (approximately 2300 cy) from the football field they are replacing there to evaluate the material as potential fill to use later on at UP River Campus. We tested all 4 samples for metals, herbicides, and pesticides. The contractor had also collected one composite sample from the soil earlier in the week and had it tested for total metals. Pesticides and herbicides were not detected in any of the samples. The only metals detected were barium, chromium, lead, and arsenic, all of which were below the EPA RSLs and DEQ cleanup levels that would potentially apply at River Campus, except for arsenic. Arsenic results for the 5 samples were:

ND  
2.88 mg/kg  
6.3 mg/kg  
7 mg/kg  
11 mg/kg

The background level we have been applying at River Campus is 7 mg/kg, so 1 of the 5 samples exceeded that level and the average (using ½ the detection limit) is less than 7 mg/kg. These results look consistent

with natural conditions and don't indicate that a release has impacted the soils. Given these results, we think this looks like acceptable material to use at the site and will save the University around \$80K potentially in fill material costs later on. We wanted to keep you in the loop as we move forward on these types of aspects of the project. Please email or give me a call today, as the high school is anxious to move ahead as soon as possible and the University is eager to support them (and get some free fill in the process).

Thanks,

Tasya

Tasya Gray, LG | Senior Geologist

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